

Jeff Carruth (TX SBN: 24001846)  
**WEYCER, KAPLAN, PULASKI & ZUBER, P.C.**  
3030 Matlock Rd., Suite 201  
Arlington, TX 76015  
Telephone: (713) 341-1158  
Fax: (866) 666-5322  
E-mail: jcarruth@wkpz.com

Christopher M. Lee  
State Bar No. 24041319  
**LEE LAW FIRM, PLLC**  
8701 Bedford Euless Rd, Ste 510  
Hurst, TX 76053  
469-646-8995 Phone  
469-694-1059 Fax

ATTORNEYS FOR  
ANSON FINANCIAL INC.  
DEBTOR AND DEBTOR IN POSSESSION

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	
	§	
<b>ANSON FINANCIAL, INC.,</b>	§	<b>CASE NO. 21-41517-elm-11</b>
	§	
<b>DEBTOR.</b>	§	

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**MOTION OF DEBTOR FOR AN ORDER DIRECTING WELLS FARGO  
TO RELEASE FUNDS**

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**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT THE ELDON B. MAHON U.S. COURTHOUSE, 501 W. 10TH ST., FORT WORTH, TX 76102-3643. BEFORE CLOSE OF BUSINESS ON APRIL 27, 2021, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

**TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:**

Anson Financial, Inc. (“Anson” or the “Debtor”), files this *Motion of Debtor for an Order directing Wells Fargo to Release Funds* (the “Motion”) and in support thereof would show to the Court the following.

1. On June 25, 2021 (the “Petition Date”), Anson commenced the above-caption case by filing a voluntary petition under Chapter 11 of the Code. Anson is in possession of its assets and is proceeding in this case as a debtor-in-possession.

2. On June 28, 2021, Wells Fargo Bank N.A. froze funds of the Debtor held in bank account ending in 5257 in the amount of \$10,789.88. This same date, Wells Fargo sent a letter to the Debtor indicating that they needed an Order from the Court in order to release said funds to the Debtor.

3. Accordingly, Debtor respectfully requests that the Court enter an Order directing Wells Fargo to release the funds held account ending in 5257 to the Debtor.

4. A proposed form of order accompanies this motion and is incorporated

WHEREFORE, Anson Financial, Inc., Debtor and Debtor in Possession, respectfully requests that the Court enter an Order directing Wells Fargo to Release the Debtor’s funds, and grant such other and further relief to which the Debtor may be entitled at law or in equity.

Dated: April 6, 2022

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth  
JEFF CARRUTH (TX SBN 24001846)  
3030 Matlock Rd., Suite 201  
Arlington, Texas 76105  
Telephone: (713) 341-1158  
Fax: (866) 666-5322  
E-mail: jcarruth@wkpz.com

ATTORNEYS FOR ANSON FINANCIAL, INC.  
DEBTOR AND DEBTOR IN POSSESSION

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on April 6, 2022 (1) by electronic notice to all ECF users who have appeared in this case to date, and/or as set forth below and (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility. *A copy of the service lists was not served with the regular mail service set but is available by contacting the undersigned.*

**In addition, a copy was mailed to:**

Wells Fargo Bank N.A.  
Deposits Bankruptcy Department  
P. O. Box 3908  
Portland, OR 97208-3908

**ANY PARTY REQUESTING A FULL SIZED COPY OF THIS PLEADING OR COPIES OF ANY EXHIBITS SHOULD CONTACT THE UNDERSIGNED.**

/s/ Jeff Carruth  
JEFF CARRUTH

**21-41517-elm11 Notice will be electronically mailed to:**

Jeffery D. Carruth on behalf of Debtor Anson Financial, Inc.  
[jcarruth@wkpz.com](mailto:jcarruth@wkpz.com),  
[jcarruth@aol.com](mailto:jcarruth@aol.com); [atty\\_carruth@trustesolutions.com](mailto:atty_carruth@trustesolutions.com);  
[carruthjr87698@notify.bestcase.com](mailto:carruthjr87698@notify.bestcase.com)

Jeffery D. Carruth on behalf of Defendant Anson Financial, Inc.  
[jcarruth@wkpz.com](mailto:jcarruth@wkpz.com),  
[jcarruth@aol.com](mailto:jcarruth@aol.com); [atty\\_carruth@trustesolutions.com](mailto:atty_carruth@trustesolutions.com);  
[carruthjr87698@notify.bestcase.com](mailto:carruthjr87698@notify.bestcase.com)

Jeffery D. Carruth on behalf of Plaintiff AFI Loan Servicing, LLC  
[jcarruth@wkpz.com](mailto:jcarruth@wkpz.com),  
[jcarruth@aol.com](mailto:jcarruth@aol.com); [atty\\_carruth@trustesolutions.com](mailto:atty_carruth@trustesolutions.com);  
[carruthjr87698@notify.bestcase.com](mailto:carruthjr87698@notify.bestcase.com)

Jeffery D. Carruth on behalf of Plaintiff Anson Financial, Inc.  
[jcarruth@wkpz.com](mailto:jcarruth@wkpz.com),  
[jcarruth@aol.com](mailto:jcarruth@aol.com); [atty\\_carruth@trustesolutions.com](mailto:atty_carruth@trustesolutions.com);  
[carruthjr87698@notify.bestcase.com](mailto:carruthjr87698@notify.bestcase.com)

Jeffery D. Carruth on behalf of Plaintiff J. Michael Ferguson P.C.  
[jcarruth@wkpz.com](mailto:jcarruth@wkpz.com),  
[jcarruth@aol.com](mailto:jcarruth@aol.com); [atty\\_carruth@trustesolutions.com](mailto:atty_carruth@trustesolutions.com);  
[carruthjr87698@notify.bestcase.com](mailto:carruthjr87698@notify.bestcase.com)

Jeffery D. Carruth on behalf of Plaintiff MBH Real Estate, LLC  
[jcarruth@wkpz.com](mailto:jcarruth@wkpz.com),  
[jcarruth@aol.com](mailto:jcarruth@aol.com); [atty\\_carruth@trustesolutions.com](mailto:atty_carruth@trustesolutions.com);  
[carruthjr87698@notify.bestcase.com](mailto:carruthjr87698@notify.bestcase.com)

Alonzo Zachary Casas on behalf of Creditor JPMORGAN CHASE BANK, N.A.  
[ecftxb@aldridgepate.com](mailto:ecftxb@aldridgepate.com),  
[acasas@ecf.inforuptcy.com](mailto:acasas@ecf.inforuptcy.com)

Amanda Allison Catlin on behalf of Creditor Sterling Bates  
[Amanda.Catlin@fnf.com](mailto:Amanda.Catlin@fnf.com)

Lawrence Chek on behalf of Creditor Wells Fargo

Bank, National Association  
[lc hek@pamlaw.com](mailto:lc hek@pamlaw.com), [mislas@pamlaw.com](mailto:mislas@pamlaw.com)

Eboney D. Cobb on behalf of Creditor City of Colleyville  
[ecobb@pbfc.com](mailto:ecobb@pbfc.com),  
[ecobb@pbfc.com;ecobb@ecf.inforuptcy.com](mailto:ecobb@pbfc.com;ecobb@ecf.inforuptcy.com)

Eboney D. Cobb on behalf of Creditor Grapevine-Colleyville ISD  
[ecobb@pbfc.com](mailto:ecobb@pbfc.com),  
[ecobb@pbfc.com;ecobb@ecf.inforuptcy.com](mailto:ecobb@pbfc.com;ecobb@ecf.inforuptcy.com)

Ian D. Ghrist on behalf of Creditor Ghrist Law Firm PLLC  
[ian@ghristlaw.com](mailto:ian@ghristlaw.com),  
[christian@ghristlaw.com](mailto:christian@ghristlaw.com); [idghrist@gmail.com](mailto:idghrist@gmail.com); [sarah@ghristlaw.com](mailto:sarah@ghristlaw.com)

Ian D. Ghrist on behalf of Defendant Ghrist Law Firm PLLC  
[ian@ghristlaw.com](mailto:ian@ghristlaw.com),  
[christian@ghristlaw.com](mailto:christian@ghristlaw.com); [idghrist@gmail.com](mailto:idghrist@gmail.com); [sarah@ghristlaw.com](mailto:sarah@ghristlaw.com)

Ian D. Ghrist on behalf of Defendant Ian Ghrist  
[ian@ghristlaw.com](mailto:ian@ghristlaw.com),  
[christian@ghristlaw.com](mailto:christian@ghristlaw.com); [idghrist@gmail.com](mailto:idghrist@gmail.com); [sarah@ghristlaw.com](mailto:sarah@ghristlaw.com)

Kathryn Hernandez on behalf of Debtor Anson Financial, Inc.  
[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Kathryn Hernandez on behalf of Defendant Anson Financial, Inc.  
[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Kathryn Hernandez on behalf of Interested Party Joe Michael Ferguson  
[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Kathryn Hernandez on behalf of Plaintiff AFI Loan Servicing, LLC  
[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Kathryn Hernandez on behalf of Plaintiff Anson Financial, Inc.

[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Kathryn Hernandez on behalf of Plaintiff J. Michael Ferguson P.C.

[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Kathryn Hernandez on behalf of Plaintiff MBH Real Estate, LLC

[k.magan@maganlawpllc.com](mailto:k.magan@maganlawpllc.com)

Areya Holder Aurzada (SBRA V)

[trustee@holderlawpc.com](mailto:trustee@holderlawpc.com),

[aha@trustesolutions.net](mailto:aha@trustesolutions.net); [cahall@trustesolutions.net](mailto:cahall@trustesolutions.net)

Christopher Marvin Lee on behalf of Debtor Anson Financial, Inc.

[ecf@leebankruptcy.com](mailto:ecf@leebankruptcy.com),

[clerk@leebankruptcy.com](mailto:clerk@leebankruptcy.com); [LeeLawFirmPLLC@jubileebooks.net](mailto:LeeLawFirmPLLC@jubileebooks.net)

Craig C. Lesok on behalf of Creditor Jentex Financial, Inc.

[craig@lesoklaw.com](mailto:craig@lesoklaw.com)

Joyce W. Lindauer on behalf of Creditor Joseph I Yammine

[joyce@joycelindauer.com](mailto:joyce@joycelindauer.com),

[dian@joycelindauer.com](mailto:dian@joycelindauer.com); [deann@joycelindauer.com](mailto:deann@joycelindauer.com); [12113@notices.nextchapterbk.com](mailto:12113@notices.nextchapterbk.com)

Mark Joseph Petrocchi on behalf of Creditor Leroy J. York Family Limited Partnership

[mpetrocchi@lawgjm.com](mailto:mpetrocchi@lawgjm.com),

[mkidd@lawgjm.com](mailto:mkidd@lawgjm.com); [mpetrocchi@yahoo.com](mailto:mpetrocchi@yahoo.com)

Laurie A. Spindler on behalf of Creditor Tarrant County

[Laurie.Spindler@lgbs.com](mailto:Laurie.Spindler@lgbs.com), [Dora.Casiano-Perez@lgbs.com](mailto:Dora.Casiano-Perez@lgbs.com); [dallas.bankruptcy@lgbs.com](mailto:dallas.bankruptcy@lgbs.com)

Matthew Tillma on behalf of Creditor JPMorgan Chase Bank, N.A. s/b/m/t Chase Bank USA, N.A.

[Matthew.Tillma@BonialPC.com](mailto:Matthew.Tillma@BonialPC.com),

[Notices.Bonial@ecf.courtdrive.com](mailto:Notices.Bonial@ecf.courtdrive.com)

United States Trustee

[ustpreion06.da.ecf@usdoj.gov](mailto:ustpreion06.da.ecf@usdoj.gov)

Lyndel Anne Vargas on behalf of Creditor B. Frazier Management, Inc.

[LVargas@chfirm.com](mailto:LVargas@chfirm.com),

[chps.ecfnotices@ecf.courtdrive.com](mailto:chps.ecfnotices@ecf.courtdrive.com); [kbeckton@ecf.courtdrive.com](mailto:kbeckton@ecf.courtdrive.com)

Lyndel Anne Vargas on behalf of Creditor Brian Frazier

[LVargas@chfirm.com](mailto:LVargas@chfirm.com),

[chps.ecfnotices@ecf.courtdrive.com](mailto:chps.ecfnotices@ecf.courtdrive.com); [kbeckton@ecf.courtdrive.com](mailto:kbeckton@ecf.courtdrive.com)

Lyndel Anne Vargas on behalf of Plaintiff B. Frazier Management, Inc.

[LVargas@chfirm.com](mailto:LVargas@chfirm.com),

[chps.ecfnotices@ecf.courtdrive.com](mailto:chps.ecfnotices@ecf.courtdrive.com); [kbeckton@ecf.courtdrive.com](mailto:kbeckton@ecf.courtdrive.com)

Lyndel Anne Vargas on behalf of Plaintiff Brian H. Frazier

[LVargas@chfirm.com](mailto:LVargas@chfirm.com),

[chps.ecfnotices@ecf.courtdrive.com](mailto:chps.ecfnotices@ecf.courtdrive.com); [kbeckton@ecf.courtdrive.com](mailto:kbeckton@ecf.courtdrive.com)

**REGULAR MAIL LIST / MATRIX**

SERVICE LIST	Case No. 21-41517	In re: Anson Financial Inc.				
Creditor list download date:	Feb. 9, 2022					
Address1	Address2	Address3	Address4	Address5	Comment on matrix	Method of Service
Ghrist Law Firm PLLC	4016 Gateway Drive Suite 130	Colleyville, TX 76034-5958				NOA-ECF
JPMORGAN CHASE BANK, N.A.					undeliverable	none
JPMorgan Chase Bank, N.A. s/b/m/t Chase Bank	14811 Dallas Parkway, Suite 425	Dallas, TX 75254-8067				Regular mail
Leroy J. York Family Limited Partnership					undeliverable	none
Magan Law, PLLC					undeliverable	NOA-ECF
Wells Fargo Bank, National Association	c/o Larry Chek	Campbell Centre One	8350 N. Central Expressway, Suite 1111	Dallas, TX 75206-1625		none (claim withdrawn)
67th Judicial District Court of Tarrant Coun	100 N Calhoun Street 4th Floor	Fort Worth, Texas 76196-0207				Regular mail
Anson Financial, Inc.	62 Main Street, Suite 310	Colleyville, TX 76034-2931				Direct email
Arvella Godbey	568 Willowview Dr.	Saginaw, TX 76179-0965				Regular mail
B. Frazier Management, Inc.					undeliverable	none
B. Frazier Management, Inc.	CO Law Office of Caleb Moore	2205 Martin Dr., Ste 200	Bedford, TX 76021-6083			Regular mail
B. Frazier Management, Inc. and Brian Frazie	c/o Lyndel Anne Vargas	Cavazos Hendricks Poirot, PC	900 Jackson St., Suite 570	Dallas, TX 75202-2413		NOA-ECF
Beall Private Investments, LP - Affirm	5712 Colleyville Blvd., Suite 200	Colleyville, TX 76034-6068				Regular mail
Carol Godbey	P.O. Box 136273	Fort Worth, TX 76136-0273				Regular mail
City of Colleyville	% Perdue Brandon Fielder Et Al	500 E. Border Street	Suite 640	Arlington, TX 76010-7457		NOA-ECF
City of Colleyville	c/o Perdue Brandon Fielder et al	500 East Border Street, Suite 640	Arlington, TX 76010-7457			NOA-ECF
G. Parker Eldridge	9420 Capiland Rd.	Desert Hot Springs, CA 92240-1101				Regular mail
Ghrist Law Firm PLLC	CO Ian Ghrist	4016 Gateway Drive Suite 130	Colleyville, Texas 76034-5958			NOA-ECF
Grapevine-Colleyville ISD	c/o Perdue Brandon Fielder et al	500 E Border Street, Suite 640	Arlington, TX 76010-7457			NOA-ECF
Grapevine-Colleyville ISD	c/o Perdue Brandon Fielder et al	500 East Border Street, Suite 640	Arlington, TX 76010-7457			NOA-ECF
Heritage Credit, LLC	5712 Colleyville Blvd., Suite 200	Colleyville, TX 76034-6068				Regular mail
Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346	Philadelphia, PA 19101-7346			Regular mail
JPMORGAN CHASE BANK N A	BANKRUPTCY MAIL INTAKE TEAM	700 KANSAS LANE FLOOR 01	MONROE LA 71203-4774		preferred	Regular mail
JPMorgan Chase Bank, N.A.	s-b-m-t Chase Bank USA, N.A.	CO National Bankruptcy Services, LLC	P.O. Box 9013	Addison, Texas 75001-9013		Regular mail

SERVICE LIST	Case No. 21-41517	In re: Anson Financial Inc.				
Creditor list download date:	Feb. 9, 2022					
Address1	Address2	Address3	Address4	Address5	Comment on matrix	Method of Service
Jentex Financial, Inc.	c/o: Cashmere Financial Services	226 Bailey Ave, Ste 104	Fort Worth, TX 76107-1260			Regular mail
Jentex Financial, Inc.	226 Bailey Ave., Suite 101	Fort Worth, TX 76107-1260				Regular mail
Joseph Imad Yammine	PO Box 11781	Fort Worth, TX 76110-0781				NOA-ECF
Larry Starks	7045 Oakbluff Dr.	Dallas, TX 75254-2754				Regular mail
Leroy J. York Family Limited Partnership	508 N. Havenwood Lane	Fort Worth, TX 76112-1013				Regular mail
Leroy York	508 N. Havenwood	Fort Worth, TX 76112-1013				none (duplicate address)
Lorraine (Rainey) York Dukes	1100 Elizabeth Blvd.	Fort Worth, TX 76110-2619				Regular mail
Simone Barron	PO Box 11781	Fort Worth, TX 76110-0781				Regular mail
Small Business Administration	SBA Disaster Loan Service Center	1545 Hawkins Blvd., Ste 202	El Paso, TX 79925-2654			Regular mail
Tarrant County	Linebarger, Goggan, Blair & Sampson, LLP	CO Laurie A. Spindler	2777 N. Stemmons Fwy Suite 1000	Dallas, TX 75207-2328		NOA-ECF
Tarrant County	Linebarger Goggan Blair & Sampson, LLP	c/o Laurie A. Spindler	2777 N. Stemmons Fwy. Ste. 1000	Dallas, TX 75207-2328		NOA-ECF
U.S. Small Business Administration	200 W. Santa Ana Blvd, Ste 740	Santa Ana, CA 92701-7534				Regular mail
United States Trustee	1100 Commerce Street	Room 976	Dallas, TX 75242-0996			NOA-ECF
Wells Fargo Bank, National Association	Attn: Dan Kline, V.P.	400 W. 15th Street, Suite 430	Austin, TX 78701-1654			none (claim withdrawn)
York Family Partnership	508 N. Havenwood	Fort Worth, TX 76112-1013				none (duplicate address)
Areya Holder Aurzada (SBRA V)	Law Office of Areya Holder, P.C.	901 Main Street, Suite 5320	Dallas, TX 75202-3700			NOA-ECF
Brian Frazier	3345 Western Center Blvd., #160	Fl. Worth			undeliverable	none
Christopher Marvin Lee	Lee Law Firm, PLLC	8701 Bedford Euless Road	Suite 510	Hurst, TX 76053-3874		NOA-ECF
Jeffery D. Carruth	Weycer, Kaplan, Pulaski & Zuber, P.C.	3030 Matlock Rd., Suite 201	Arlington, TX 76015-2936			NOA-ECF
Joe Michael Ferguson					undeliverable	none
Joseph I Yammine					undeliverable	none
Kathryn Hernandez	Magan Law, PLLC	62 Main St.	Suite 310	Colleyville, TX 76034-2931		NOA-ECF
Simone Barron					undeliverable	none
Sterling Bates					undeliverable	NOA-ECF

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	
	§	
<b>ANSON FINANCIAL, INC.,</b>	§	<b>CASE NO. 21-41517-elm-11</b>
	§	
<b>DEBTOR.</b>	§	

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**ORDER GRANTING MOTION OF DEBTOR FOR ORDER DIRECTING  
WELLS FARGO TO RELEASE FUNDS**

On this day came on for consideration the *Motion of Debtor for an Order Directing Wells Fargo to Release Funds* (the “Motion”) filed herein on April 6, 2022 by Anson Financial, Inc., Debtor and Debtor in Possession in the above-captioned case (the “Debtor”).

The Court finds and concludes that the Motion contains the appropriate notices under the Local Bankruptcy Rules; according to the certificate of service attached to the Motion, the Motion was served upon the parties entitled to receive notice under the Local Bankruptcy Rules;



no party in interest filed a response or objection to the Motion or any such response or objection is overruled by this Order; and that upon review of the record of this case and with respect to the Motion that cause exists to grant the relief requested therein.

IT IS THEREFORE ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Wells Fargo Bank N.A. is directed to Release funds of the Debtor held in account ending in 5257 to the Debtor.

#### END OF ORDER ####